

13305

Monge, Elaine (SCA)

From: Ferrar, Joy <JFerrar@bakerlaw.com>
Sent: Friday, July 13, 2018 5:53 PM
To: Cable, Sara (AGO)
Cc: Breaches, Data (SCA); Kitchen, David E.
Subject: Incident Notification
Attachments: MA AG Notification.pdf

Dear Sir or Madam,

Attached please find an incident notification.

Thank you,

Dave Kitchen
Partner

BakerHostetler

Key Tower
127 Public Square | Suite 2000
Cleveland, OH 44114-1214
T +1.216.861.7060

dkitchen@bakerlaw.com
bakerlaw.com



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Attorney General Maura Healey
July 13, 2018
Page 2

IdentityWorksSM Credit 3B. SHS is also providing a telephone number for potentially affected individuals to call with any questions they may have.

To help prevent something like this from happening in the future, SHS is enhancing its existing network security measures and providing training to employees on the dangers of phishing emails.

Please do not hesitate to contact me if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David E. Kitchen", written over a horizontal line.

David E. Kitchen
Partner

Enclosures

cc: Office of Consumer Affairs and Business Regulation
(via email - data.breaches@state.ma.us)



1350 Avenue of the Americas
31st Floor
New York, NY 10019

July 13, 2018

<Name>
<Address>
<City>, <State> <Zip code>
<country>

Dear <Name>:

Sanford Heisler Sharp, LLP ("SHS") understands the importance of protecting personal information entrusted to us. We are writing to inform you that we recently identified and addressed a security incident that may have involved your personal information. This notice explains some steps you can take in response to the incident.

We encourage you to remain vigilant by reviewing your account statements for any unauthorized activity. You should also review the additional information on the following pages on ways to protect yourself. **In an abundance of caution, we have arranged for you to receive a complimentary one-year membership of Experian's® IdentityWorksSM Credit 3B.** This product helps detect possible misuse of your personal information and provides you with identity protection services focused on immediate identification and resolution of identity theft. IdentityWorks Credit 3B is completely free to you and enrolling in this program will not hurt your credit score. **For more information on identity theft prevention and IdentityWorks Credit 3B, including instructions on how to activate your complimentary one-year membership, please see the additional information provided in this letter.**

We apologize for any inconvenience caused by this incident. To help prevent this type of incident from happening again, we are taking steps to enhance our existing network security measures and providing training to employees on the dangers of phishing emails. If you have questions about this incident or the recommended next steps, please call 866-742-4955, Monday through Friday between 9:00 am and 5:00 pm Eastern Time.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Jeremy Heisler'.

Jeremy Heisler
Vice Chairman

BakerHostetler

Baker & Hostetler LLP

Key Tower
127 Public Square, Suite 2000
Cleveland, OH 44114-1214

T 216.621.0200
F 216.696.0740
www.bakerlaw.com

David E. Kitchen
direct dial: 216.861.7060
dkitchen@bakerlaw.com

July 13, 2018

**VIA OVERNIGHT MAIL AND
EMAIL: SARA.CABLE@STATE.MA.US**

Attorney General Maura Healey
Office of the Attorney General
One Ashburton Place
Boston, MA 02108

Re: Incident Notification

Dear Attorney General Healey:

I am writing on behalf of our client, Sanford Heisler Sharp, LLP ("SHS"), to notify you of a security incident involving three (3) Massachusetts residents.

On May 23, 2018, SHS learned through its ongoing forensic investigation into a phishing incident that an unauthorized party obtained access to an email account belonging to an SHS partner. Upon learning of the phishing incident, SHS immediately reset passwords for all affected employee accounts and began an investigation with the assistance of a professional forensic firm. The investigation determined that unauthorized individual(s) had accessed the partner's account from May 9 through May 14, 2018. The investigation was unable to determine the scope of information that may have been viewed or acquired by the individual(s). Therefore, SHS provided notice to all individuals whose information was contained in the email account. On June 13, 2018, SHS learned that the email account may contain information pertaining to Massachusetts residents. For each of the Massachusetts residents, the emails and attachments contained the individual's name and one or more of the following data elements: Social Security number, and financial account number.

On July 13, 2018, SHS will begin mailing written notifications to potentially affected individuals, including three (3) Massachusetts residents who are being notified of the incident in writing in accordance with M.G.L. c. 93H § 3 (b) in substantially the same form as the enclosed letters.¹ SHS is offering all eligible potentially affected individuals a complimentary one-year membership in credit monitoring and identity theft protection services from Experian's®

¹ This report is not, and does not constitute, a waiver of SHS's objection that Massachusetts lacks personal jurisdiction regarding the company related to this matter.

To help protect your identity, we are offering a **complimentary** one-year membership of Experian IdentityWorksSM Credit 3B. This product helps detect possible misuse of your personal information and provides you with superior identity protection support focused on immediate identification and resolution of identity theft.

Activate IdentityWorks Credit 3B Now in Three Easy Steps

1. **ENROLL** by: **October 31, 2018** (Your code will not work after this date.)
2. **VISIT** the **Experian IdentityWorks website** to enroll: <https://www.experianidworks.com/3bcredit>
3. **PROVIDE** the **Activation Code**:

If you have questions about the product, need assistance with identity restoration or would like an alternative to enrolling in Experian IdentityWorks online, please contact Experian's customer care team at 877-890-9332. Be prepared to provide engagement number **DB07727** as proof of eligibility for the identity restoration services by Experian.

ADDITIONAL DETAILS REGARDING YOUR 12-MONTH EXPERIAN IDENTITYWORKS CREDIT 3B MEMBERSHIP:

A credit card is **not** required for enrollment in Experian IdentityWorks Credit 3B.

You can contact Experian **immediately without needing to enroll in the product** regarding any fraud issues. Identity Restoration specialists are available to help you address credit and non-credit related fraud.

Once you enroll in Experian IdentityWorks, you will have access to the following additional features:

- **Experian credit report at signup:** See what information is associated with your credit file. Daily credit reports are available for online members only.*
- **Credit Monitoring:** Actively monitors Experian, Equifax and Transunion files for indicators of fraud.
- **Experian IdentityWorks ExtendCARETM:** You receive the same high-level of Identity Restoration support even after your Experian IdentityWorks membership has expired.
- **\$1 Million Identity Theft Insurance^{**}:** Provides coverage for certain costs and unauthorized electronic fund transfers.

Activate your membership today at <https://www.experianidworks.com/3bcredit> or call 877-890-9332 to register with the activation code above.

What you can do to protect your information: There are additional actions you can consider taking to reduce the chances of identity theft or fraud on your account(s). Please refer to www.ExperianIDWorks.com/restoration for this information. If you have any questions about IdentityWorks, need help understanding something on your credit report or suspect that an item on your credit report may be fraudulent, please contact Experian's customer care team at 877-890-9332.

* Offline members will be eligible to call for additional reports quarterly after enrolling.

** Identity theft insurance is underwritten by insurance company subsidiaries or affiliates of American International Group, Inc. (AIG). The description herein is a summary and intended for informational purposes only and does not include all terms, conditions and exclusions of the policies described. Please refer to the actual policies for terms, conditions, and exclusions of coverage. Coverage may not be available in all jurisdictions.

MORE INFORMATION ON WAYS TO PROTECT YOURSELF

We recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

Experian, PO Box 2002, Allen, TX 75013, www.experian.com, 1-888-397-3742
TransUnion, PO Box 2000, Chester, PA 19016, www.transunion.com, 1-800-916-8800
Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission and Massachusetts Attorney General is as follows:

Federal Trade Commission, Consumer Response Center, 600 Pennsylvania Avenue, NW
Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

Office of the Attorney General, One Ashburton Place, Boston, MA 02108, 1-617-727-8400,
www.mass.gov/ago/contact-us.html

Note that pursuant to Massachusetts law, you have the right to file and obtain a copy of any police report. Massachusetts law also allows consumers to request a security freeze. A security freeze prohibits a credit reporting agency from releasing any information from your credit report without written authorization. Be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services.

The fee for placing a security freeze on a credit report is \$5.00. If you are a victim of identity theft and submit a valid investigative report or complaint with a law enforcement agency, the fee will be waived. In all other instances, a credit reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze.

If you have not been a victim of identity theft, you will need to include payment to the credit reporting agency to place, lift, or remove a security freeze by check, money order, or credit card. To place a security freeze on your credit report, you must send a written request to each of the three major reporting agencies by regular, certified, or overnight mail at the addresses below:

Experian Security Freeze, PO Box 9554, Allen, TX 75013, www.experian.com
TransUnion Security Freeze, PO Box 2000, Chester, PA 19016, www.transunion.com
Equifax Security Freeze, PO Box 105788, Atlanta, GA 30348, www.equifax.com

In order to request a security freeze, you will need to provide the following information:

1. Your full name (including middle initial as well as Jr., Sr., II, III, etc.)
2. Social Security number
3. Date of birth

4. If you have moved in the past five (5) years, provide the addresses where you have lived over the prior five years
5. Proof of current address such as a current utility bill or telephone bill
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)
7. If you are a victim of identity theft, include a copy of the police report, investigative report, or complaint to a law enforcement agency concerning identity theft.

The credit reporting agencies have three (3) business days after receiving your request to place a security freeze on your credit report. The credit bureaus must also send written confirmation to you within five (5) business days and provide you with a unique personal identification number ("PIN") or password or both that can be used by you to authorize the removal or lifting of the security freeze.

To lift the security freeze in order to allow a specific entity or individual access to your credit report, you must call or send a written request to the credit reporting agencies by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze as well as the identity of those entities or individuals you would like to receive your credit report or the specific period of time you want the credit report available. The credit reporting agencies have three (3) business days after receiving your request to lift the security freeze for those identified entities or for the specified period of time. To remove the security freeze, you must send a written request to each of the three credit bureaus by mail and include proper identification (name, address, and Social Security number) and the PIN number or password provided to you when you placed the security freeze. The credit bureaus have three (3) business days after receiving your request to remove the security freeze.



c/o RG/2 Claims Administration
P.O. Box 59479
Philadelphia, PA 19103-9479

July 13, 2018

<Name>
<Address>
<City>, <State> <Zip code>
<country>

Dear <Name>:

Sanford Heisler & Sharp LLP ("SHS") understands the importance of protecting personal information entrusted to us. We are writing to inform you that we recently identified and addressed a security incident that may have involved your personal information. This notice explains some steps you can take in response to this incident.

We encourage you to remain vigilant to the possibility of fraud and identity theft by reviewing your financial statements and credit reports for any unauthorized activity. You should immediately report any unauthorized charges to your financial institution, as major credit card companies have rules that restrict them from requiring you to pay for fraudulent charges that are timely reported. You should also review the additional information on the following page on ways to protect yourself.

We apologize for any inconvenience caused by this incident. To help prevent this type of incident from happening again, we are taking steps to enhance our existing network security measures and providing training to employees on the dangers of phishing emails. If you have questions about this incident or the recommended next steps, please call 866-742-4955, Monday through Friday between 9:00 am and 5:00 pm Eastern Time.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Jeremy Heisler'.

Jeremy Heisler
Vice Chairman

MORE INFORMATION ON WAYS TO PROTECT YOURSELF

We recommend that you remain vigilant for incidents of fraud or identity theft by reviewing your account statements and credit reports for any unauthorized activity. You may obtain a copy of your credit report, free of charge, once every 12 months from each of the three nationwide credit reporting companies. To order your annual free credit report, please visit www.annualcreditreport.com or call toll free at 1-877-322-8228. Contact information for the three nationwide credit reporting companies is as follows:

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Equifax, PO Box 740241, Atlanta, GA 30374, www.equifax.com, 1-800-685-1111

If you believe you are the victim of identity theft or have reason to believe your personal information has been misused, you should immediately contact the Federal Trade Commission and/or the Attorney General's office in your state. You can obtain information from these sources about steps an individual can take to avoid identity theft as well as information about fraud alerts and security freezes. You should also contact your local law enforcement authorities and file a police report. Obtain a copy of the police report in case you are asked to provide copies to creditors to correct your records. Contact information for the Federal Trade Commission and Massachusetts Attorney General is as follows:

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Washington, DC 20580, 1-877-IDTHEFT (438-4338), www.ftc.gov/idtheft

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www.mass.gov/ago/contact-us.html

Note that pursuant to Massachusetts law, you have the right to file and obtain a copy of any police report. Massachusetts law also allows consumers to request a security freeze. A security freeze prohibits a credit reporting agency from releasing any information from your credit report without written authorization. Be aware that placing a security freeze on your credit report may delay, interfere with, or prevent the timely approval of any requests you make for new loans, credit mortgages, employment, housing, or other services.

The fee for placing a security freeze on a credit report is \$5.00. If you are a victim of identity theft and submit a valid investigative report or complaint with a law enforcement agency, the fee will be waived. In all other instances, a credit reporting agency may charge you up to \$5.00 each to place, temporarily lift, or permanently remove a security freeze.

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3. Date of birth

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5. Proof of current address such as a current utility bill or telephone bill
6. A legible photocopy of a government issued identification card (state driver's license or ID card, military identification, etc.)
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